

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION



U.S. Magistrate Judge

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 3:09-0445
	)	
v.	)	
	)	
JAMES W. CARELL, ROBERT VINING,	)	JURY DEMAND
DIVERSIFIED HEALTH MANAGEMENT,	)	
INC. (also known as CARELL	)	
MANAGEMENT, LLC), THE JAMES W.	)	
CARELL FAMILY TRUST, CAREALL,	)	
INC., VIP HOME NURSING AND	)	
REHABILITATION SERVICES, LLC	)	
(also known as VIP HOME NURSING AND	)	
REHABILITATION SERVICES, INC.),	)	
PROFESSIONAL HOME HEALTH CARE,	)	
LLC (also known as PROFESSIONAL HOME	)	
HEALTH CARE, INC.), and UNIVERSITY	)	
HOME HEALTH, LLC (also known as	)	
UNIVERSITY HOME HEALTH, INC.),	)	
	)	
Defendants.	)	

**DEFENDANTS' CONSOLIDATED MOTION FOR  
LEAVE TO FILE A REPLY MEMORANDUM**

Pursuant to Local Rule 7.01(b), Defendants James W. Carell and CareAll, Inc. respectfully move the Court for leave to file a memorandum of not more than 17 pages in reply to the United States' Response to Defendants' Consolidated Motion to Compel Responses to Interrogatories Served on the United States Attorney's Office and the FBI. The proposed Reply accompanies this Motion.

As grounds for this motion, Defendants would show as follows:

1. The United States has failed to comply with the requirements of Rule 37 such that its "evasive or incomplete disclosure[s], answer[s], or response[s] must be treated as a failure to